

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)

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CC Docket No. 92-105

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OCT 10 1996

Federal Communications Commission
Office of Secretary

COMMENTS OF AT&T CORP.

AT&T Corp. ("AT&T") hereby responds to the Commission's Public Notice (the "Public Notice") soliciting comment on the request of the United States Department of Justice ("DOJ") concerning use of an N11 code for non-emergency police telephone calls.¹

In a letter to the Commission, DOJ requested that the Commission reserve an N11 code, (i.e., the 311 code), on a national basis for the purpose of use by local communities for non-emergency police telephone calls.² DOJ stated that the request furthered existing efforts to alleviate the burden of non-emergency calls on the nation's 911 emergency systems and responded to President Clinton's call for development of a national community policing number that "will be as easy to use and remember as 911." DOJ also noted that it planned to

¹ In the Matter of Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, DA 96-1500, Public Notice, released September 10, 1996.

² See Letter to Regina Kenney, Chief, Common Carrier Bureau, Federal Communications Commission, from Joseph Brann, Director, Office of Community Oriented Policing Services, DOJ ("DOJ Letter"), dated August 26, 1996.

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support and evaluate a pilot implementation program for use of a non-emergency police number in Baltimore, Maryland.³

AT&T has long recognized that N11 codes are a scarce resource that should be allocated in a manner that maximizes beneficial use by the largest number of carriers and customers.⁴ Consistent with this principle, AT&T has supported the use of N11 codes for community service functions, both to extend benefits of the numbering resource to as wide a range of subscribers as possible and to reinforce the public's association of such codes with such services.⁵ The non-emergency policing use of 311 is another example of the broad-based community service to which N11 codes can be put.

Reservation of the 311 (or another N11) code on a national basis by the Commission for non-emergency use could well "reinforce partnerships that form the cornerstone of community policing," as DOJ suggests.⁶ Further, as AT&T has recognized with its committed response to the Administration's call to action for a national non-emergency number, the

³ DOJ Letter, p. 1.

⁴ See, e.g., In the Matter of Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Comments of AT&T, filed June 5, 1992.

⁵ AT&T has, for example, advocated use of N11 codes to support services for the hearing-impaired. See, e.g., In the Matter of Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket 92-105, Ex Parte Presentation of AT&T, filed March 10, 1993.

⁶ See DOJ Letter, p. 1.

nationwide use of an N11 code for such purposes could substantially reduce the burden on 911 emergency services.⁷ Moreover, by reserving a single N11 code for use nationwide, the Commission can promote uniformity and consistency that will facilitate public understanding and acceptance of N11 code non-emergency policing use.

There are, however, a number of practical issues that the Commission must resolve before it establishes guidelines for and implements N11 code non-emergency use on a nationwide basis. In this regard, the trials in Baltimore and in other cities present valuable opportunities for the Commission to gather information. The parties conducting these trials will be required to educate subscribers in order to facilitate introduction and use of N11 non-emergency service; they will also need to determine the technical standards that carriers must meet to support the service. Eventually, they will need to adopt a mechanism for funding of N11 non-emergency service, either in the manner that 911 emergency service was funded or through other means. The Commission should encourage and actively monitor such trials,

⁷ AT&T concurs with the DOJ's Office of Community Oriented Policing Service that we "can no longer afford to put on hold the problem of overloading 911." See "Attorney General Reno Launches New Non-Emergency Phone System," DOJ News Release, October 2, 1996 (citing AT&T's efforts with Baltimore police and DOJ in conducting trial of 311 non-emergency service). For the past year, AT&T has consulted with law enforcement officials nationwide on ways to apply communications technology to their concerns about the overburdened 911 system.

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so that it can then develop a template for implementation of an N11 non-emergency code to be used by local jurisdictions and communities nationwide.⁸

CONCLUSION

Accordingly, the Commission should promptly begin the process of establishing an N11 code for nationwide, non-emergency use.

Respectfully submitted,

AT&T CORP.

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⁸ Communities conducting trials of N11 non-emergency service will, for example, need to determine whether supporting carriers must identify the number or location of the calling party, and whether other or additional information must be provided. Trialing communities must also determine whether specific circumstances affecting particular carriers (such as small independent telephone companies or wireless carriers) require that different implementation requirements or schedules be adopted for such carriers. Finally, the trialing communities will need to consider the observations of those who provide and support 911 emergency service concerning implementation of N11 non-emergency service. The Commission would need to address all of these issues in order to develop appropriate implementation principles for N11 code non-emergency use.

CERTIFICATE OF SERVICE

I, Karen Gillis, do hereby certify that on this 10th day of October, 1996, a copy of the foregoing "Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed below:

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